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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re: § **Chapter 11**
§
ZENERGY BRANDS, INC., et al.¹ § **Case No. 19-42886**
§
Debtors. § **(Jointly Administered)**

**SECOND MOTION TO EXTEND (I) RULE 2004 DOCUMENT PRODUCTION
DEADLINE AND (II) CHALLENGE PERIOD**

1. TCA Global Credit Mater Fund, L.P. and TCA Special Situations Credit Strategies ICAV (collectively, the "Secured Lenders") respectfully request that the Court continue the deadlines for (a) the Secured Lenders to produce certain documents to Zenergy Brands, Inc. and the related Debtor entities (collectively, the "Debtors") pursuant to Rule 2004 of the Federal and Local Rules of Bankruptcy Procedure, and (b) the Official Committee of Unsecured Creditors (the "Committee") to challenge the stipulations or findings of the second interim order approving postpetition financing (the "DIP Order") [ECF No. 119]. In support of these requests the Secured Lenders state:

¹ The Debtors in the above-captioned chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Zenergy Brands, Inc. (1686); NAUP Brokerage, LLC (7899); Zenergy Labs, LLC (8045); Zenergy Power & Gas, Inc. (1963); Enertrade Electric, LLC (8649); Zenergy & Associates, Inc. (4022); and Zen Technologies, Inc. (7309). The above-captioned Debtors' mailing address is 5700 Grante Pkwy, #200, Plano, TX 75024.

2. On December 11, 2019 the Court entered an order directing the Secured Lenders to produce for inspection and copying certain documents to the Debtors, beginning not later than December 7, 2019 and continuing through noon on December 18, 2019. ECF No. 125.

3. Additionally, on December 4, 2019 the court entered the DIP Order. ECF No. 119. Per ¶ 33 of the DIP Order, the "Challenge Period" within which the Committee may challenge the stipulations or findings therein expires on February 10, 2020.

4. The parties are engaged in settlement negotiations that may render the Rule 2004 discovery and Challenge Period moot. As such, on December 18, 2019 the Secured Lenders filed an agreed motion to extend the deadline for document production to January 8, 2020, and continue the Challenge Period Deadline by three weeks, through March 2, 2020. ECF No. 132. The Court granted the motion and extended the deadlines accordingly. ECF No. 138.

5. The parties are continuing to engage in settlement negotiations that may render the Rule 2004 discovery and Challenge Period moot. As such, the Secured Lenders respectfully request entry of a second order extending the deadline for document production to noon CST on January 29, 2020 and the Challenge Period Deadline through March 23, 2020.

6. This request is not being sought for purposes of delay and will not prejudice any interested party.

7. Prior to filing this motion counsel for the Secured Lenders attempted to communicate with counsel for the Debtors and Committee regarding the relief requested herein, but has not yet received a response.

WHEREFORE, the Secured Lenders respectfully request entry of an Order: (a) granting the relief requested herein and (b) such other relief as the Court deems appropriate under the circumstances.

Dated: January 8, 2020

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By: /s/ Bradley S. Shraiberg
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Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via Notice of Electronic Filing by CM/ECF to all parties registered to receive such service in this case on this the 8th day of January, 2020.

/s/ Bradley S. Shraiberg
Bradley S. Shraiberg, Esq.

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